



<b>SOUTH COAST AIR QUALITY MANAGEMENT</b>	Pages <b>2</b>	Page <b>1</b>
<b><i>ENGINEERING AND COMPLIANCE DIVISION</i></b> <b><i>Refinery &amp; Waste Management Permitting</i></b>	A/N <b>534013</b>	Date <b>09/21/12</b>
<b>TESORO LOGISTICS – WILMINGTON SALES TERMINAL</b> <b>RULE 462 CMS PLAN MODIFICATION</b>	Processed by TL03	Checked by

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<p>EVALUATION FOR RULE 462 CONTINUOUS MONITORING SYSTEM (CMS) PLAN</p>
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### **COMPANY NAME AND LOCATION ADDRESS**

Tesoro Logistics Operations LLC  
1930 E. Pacific Coast Highway  
Wilmington, CA 90744

Facility ID# 167981

### **A/N 534013 – MODIFICATION OF RULE 462 CMS PLAN**

### **BACKGROUND**

This is a Title V facility which is a petroleum product storage and distribution bulk terminal. The facility stores gasoline and diesel fuel which are received primarily by pipeline and are transferred to tanker trucks at four permitted loading racks for further distribution to the market place. The loading racks are vented to a thermal oxidizer currently permitted under Permit to Construct No. 525928.

Tesoro Logistics' tank truck loading operation qualifies a "Class "A" Facility" under AQMD Rule 462. As such, the facility is required to vent the vapors generated from the tank truck loading operation to a vapor recovery and/or disposal system, which the aforementioned thermal oxidizer satisfies. In turn, the vapor recovery/disposal system is required to be equipped with a Continuous Monitoring System (CMS) that is approved by the AQMD. A Rule 462 CMS Plan was originally approved for the thermal oxidizer in 2004 when it was operated by Equilon Enterprises (ID 116869; A/N 359501). In 2009, Equilon underwent change of ownership and became Tesoro Refining & Marketing Company (ID 151984) and the CMS plan (A/N 474587) was re-issued under the new company name. In 2011, still another change of ownership ensued (Tesoro Logistics, ID 167981) and a new CMS plan (A/N 516785) was submitted. This plan was processed and dispositioned but the change of ownership Title V permit was not issued to the facility due to the existence of a pending TV renewal application for Tesoro Logistics. It was decided that the said Title V renewal application would be processed and the change of ownership would be included in the renewal. However, Tesoro Logistics has now submitted this application (A/n 534013) to modify their "existing" Rule 462 CMS Plan. The modified Plan will be included as a minor permit revision and will be released simultaneously with the proposed Title V permit renewal.



<b>SOUTH COAST AIR QUALITY MANAGEMENT</b>	Pages <b>2</b>	Page <b>2</b>
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### **NOV/NC HISTORY**

There have been no NOV's or NC's issued for this facility within the last 2 years.

### **PROPOSED MODIFICATIONS**

Tesoro Logistics proposes modify the Rule 462 CMS Plan by allowing the use of thermocouples that are equivalent to the current Plan's specified Type "K" thermocouple. In addition, the company is proposing to change the type and number of data recorders from a single strip chart type recorder to multiple chart and/or electronic data recorders. Other minor Plan language changes have been suggested to support and/or clarify these proposed Plan modifications (See Tesoro's CMS document submittal dated February 2012)

### **EMISSIONS CALCULATIONS**

Not applicable.

### **DISCUSSION**

The new recorders are functionally identical to the existing strip chart recorder requirement and are thought to be more reliable as the company has had past problems with strip chart recorder breakdowns. By and large, AQMD concurs with Tesoro's proposed changes to the existing Plan with some minor deletions additions. However, a fairly significant addition to the Plan that Tesoro did not propose will be a condition outlining the requirements for electronic data storage. See draft modified CMS Plan included in this folder.

### **RECOMMENDATIONS**

Propose the Rule 462 modified CMS Plan in Section I as a minor permit revision under Regulation XXX and release with Tesoro Logistics' proposed Title V permit renewal/CAM evaluation for EPA 45-day review & 30-day public notice comment periods (see A/Ns 534019 & 534027).